

1 RENE L. VALLADARES
2 Federal Public Defender
3 State Bar No. 11479
4 HEATHER FRALEY
5 Assistant Federal Public Defender
6 411 E. Bonneville, Ste. 250
7 Las Vegas, Nevada 89101
8 (702) 388-6577/Phone
9 (702) 388-6261/Fax
10 Heather_Fraley@fd.org

11 Attorney for Adrian Isaiah Quebec

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 ADRIAN ISAIAH QUEBEC,

18 Defendant.

19 Case No. 2:23-mj-00012-BNW

20 **STIPULATION TO CONTINUE
PRELIMINARY HEARING**
21 (First Request)

22 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
23 United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the
24 United States of America, and Rene L. Valladares, Federal Public Defender, and
25 Heather Fraley, Assistant Federal Public Defender, counsel for Adrian Isaiah Quebec, that the
26 Preliminary Hearing currently scheduled on January 23, 2023, be vacated and continued to a
date and time convenient to the Court, but no sooner than ninety (90) days.

27 This Stipulation is entered into for the following reasons:

28 1. The parties are currently involved in negotiations to resolve this matter pre-
29 indictment. If this case ultimately does go to preliminary hearing or trial, the parties need
30 additional time to review discovery and effectively prepare for the hearing or trial.

1 2. The defendant is not in custody and agrees with the need for the continuance.
2 3. The parties agree to the continuance.
3 4. Additionally, denial of this request for continuance could result in a miscarriage
4 of justice.

5 5. The additional time requested herein is not sought for purposes of delay, but to
6 allow parties to negotiate.

7 6. The additional time requested by this stipulation, is allowed, with the
8 defendant's consent under the Federal Rules of Procedure 5.1 (d).

9 7. The additional time requested by this stipulation is excludable in computing the
10 time within which the defendant must be indicted and the trial herein must commence pursuant
11 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under
12 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

13 This is the first request for a continuance of the preliminary hearing.

14 DATED this 13th day of January 2023.

16 RENE L. VALLADARES
17 Federal Public Defender

16 JASON M. FRIERSON
17 United States Attorney

18 /s/ *Heather Fraley*
19 By _____
20 HEATHER FRALEY
21 Assistant Federal Public Defender

18 /s/ *Bianca R. Pucci*
19 By _____
20 BIANCA R. PUCCI
21 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ADRIAN ISAIAH QUEBEC,
Defendant.

Case No. 2:23-mj-00012-BNW

ORDER

IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for Monday, January 23, 2023 at 1:30 p.m. be vacated and continued to April 24, 2023 at 2:30 p.m.

DATED: January 18, 2023.

Ben Wexler
UNITED STATES MAGISTRATE JUDGE